

STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
SECURITIES DIVISION

IN THE MATTER OF DETERMINING) Order No. S-03-085-03-TO01
Whether there has been a violation of the)
Securities Act of Washington by:) SUMMARY ORDER TO CEASE AND
) DESIST AND NOTICE OF INTENT TO
) IMPOSE FINES

Mark Robison; The Havenhurst Group;)
Dennis Cope; Green Gables Group;)
Karen Thurston; Cambio Corporation;)
Millennium Group International, Inc.;)
FIIK Investment & Holdings, Inc.;)
Partner Bank, AD; Edgar Bias; Aaron
Mace; and Charles Covell;

Respondents

THE STATE OF WASHINGTON TO: Mark Robison; The Havenhurst Group;
Dennis Cope; Green Gables Group; Karen
Thurston; Cambio Corporation; Millennium
Group International, Inc.; FIIK Investment &
Holdings, Inc.; Partner Bank, AD; Edgar Bias;
Aaron Mace; and Charles Covell;

STATEMENT OF CHARGES

Please take notice that the Securities Administrator of the State of Washington has reason to believe that Respondents, Mark Robison; The Havenhurst Group; Dennis Cope; Green Gables Group; Karen Thurston; Cambio Corporation; Millennium Group International, Inc.; FIIK Investment & Holdings, Inc.; Partner Bank, AD; Edgar Bias; Aaron Mace; and Charles Covell have each violated the Securities Act of Washington and that their violations justify the entry of an order of the Securities Administrator under RCW 21.20.390 against each to cease and desist from such violations and the imposition of fines under RCW 21.20.395. The Securities Administrator finds that delay in ordering the Respondents to cease and desist from such

SUMMARY ORDER TO CEASE AND DESIST AND 1
NOTICE OF INTENT TO IMPOSE FINES

DEPARTMENT OF FINANCIAL INSTITUTIONS
Securities Division
PO Box 9033
Olympia, WA 98507-9033
360-902-8760

1 violations would be hazardous to the investors and to the public and that a Summary Order to
2 Cease and Desist should be entered immediately. The Securities Administrator finds as follows:

3 **TENTATIVE FINDINGS OF FACT**

4 **PARTIES**

5 **I.**

6 The Havenhurst Group is a business entity with its principal place of business at 432 E
7 Idaho Ste C239, Kalispell, MT 59901.

8 **II.**

9 Cambio Corporation is a Nevada corporation with a mailing address of 3885 Decatur
10 Blvd Ste 2010, Las Vegas, NV 89103.

11 **III.**

12 Green Gables Group also known as Green Gables Management is a business entity with
13 its principal place of business at 2753 E Broadway Ste 101, Mesa AZ 85204. Green Gables
14 Group refers to itself as a private member organization.

15 **IV.**

16 Millennium Group International, Inc. is a Nevada corporation with a principal place of
17 business at 2753 E Broadway Ste 101, Mesa AZ 85204. Millennium Group, Inc. previously did
18 business at 1051 N 140 E, Orem, Utah 84507. Millennium Group International, Inc. styles itself
19 “a private member organization for the development of financial security.” Millennium Group
20 International, Inc. operated a website at www.millenium-group.org on which it posted
21 information for its members as well as information for nonmembers relating to applying for
22 membership and other topics. The Millennium Group International, Inc. adopted the name Green
23 Gables Group in August 2000.

1 V.

2 FIIK Investment & Holdings, Inc. is a corporation with its principal place of business at
3 2121 Sage Rd Ste 250, Houston, TX 77056.

4 VI.

5 Partner Bank, AD is a purported bank located in Montenegro. Partner Bank, AD claimed
6 to maintain a Canadian office at 895 Fort St Ste 302, Victoria, British Columbia V8W1H7. The
7 Office of the Superintendent of Financial Institutions Canada issued a warning advisory in
8 January 2001 stating that Partner Bank, AD was not an authorized bank in Canada although it
9 might have been carrying on a banking business in Canada without authorization.
10

11 VII.

12 Mark Robison, a resident of Kalispell, Montana, is the owner and principal of the
13 Havenhurst Group. He is also treasurer of Cambio Corporation. Robison was a member of
14 Millennium Group International, Inc. He was a speaker at the Millennium Group International,
15 Inc. convention held in June 2000 in Las Vegas, Nevada.

16 VIII.

17 Karen Thurston is a resident of Vancouver, Washington. Karen Thurston's sister is Mark
18 Robison's wife.

19 IX

20 Dennis Cope, an Arizona resident, is principal of Green Gables Group. He is also a
21 principal of Millennium Group International, Inc.
22

23 X.

24 Edgar Bias is chief executive officer of FIIK Investment & Holdings, Inc.
25

1 XI.

2 Aaron Mace is a former or current resident of the Tri-Cities area. He has also been a
3 resident of Utah.

4 XII.

5 Charles Covell is executive vice president of Partner Bank, AD. Dennis Cope has told
6 investors that Charles Covell's true name is Chuck White.

7 XIII.

8 **OVERVIEW OF SCHEME AND WASHINGTON SALES ACTIVITIES**

9
10 Beginning in 1998 and continuing mid-2000 or later, Green Gables Group and
11 Millennium Group International, Inc. have caused investment products to be offered, directly and
12 indirectly, to Washington residents. These investments were in the form of agreements called
13 Private Party Loan Agreements as well as in memberships that included a profit-sharing feature.
14 Some of the Washington residents invested in Private Party Loan Agreements or similar
15 investments with other companies but were later told that their funds had actually been invested
16 in Millennium Group International, Inc.

17 Under the Private Party Loan Agreements, investors were to receive a return, generally
18 between 10%-12%, on their investments over a specified period. The moneys invested under
19 these agreements were to be pooled with those from other investors and invested to generate
20 profits. At least 12 Washington residents invested at least \$191,000, directly or indirectly, in
21 Green Gables Group or Millennium International Group, Inc. investments. These Washington
22 residents came from various parts of the state, including Port Angeles, Bellingham, Vancouver,
23 and the Tri-Cities area. At least four persons offered and sold these investments to Washington
24 residents. Most of the offers were made to members of the Mormon church.
25

1 Millennium Group International, Inc. also offered a profit-sharing membership
2 arrangement in which members paid dues, which were then to be pooled, invested, and the
3 profits of the investments shared among the members. Several Washington residents became
4 members of Millennium Group International, Inc.

5 In 2000, Millennium Group International, Inc. entered into some kind of arrangement
6 with FIIK Investment & Holdings, Inc., under which funds of Millennium Group International,
7 Inc. were invested through FIIK Investment & Holdings, Inc. Millennium Group International,
8 Inc. purported to offer rescission to investors in its Private Party Loan Agreements. It then stated
9 that it had cancelled those agreements. At the same time, FIIK Investment & Holdings, Inc.
10 offered investors a new agreement in which the funds invested through Millennium Group
11 International, Inc. would be transferred to FIIK Investment & Holdings, Inc. Green Gables
12 Group (the new name for Millennium Group International, Inc.) was still to be the point of
13 contact with these new agreements.
14

15 FIIK Investment & Holding, Inc. purported to convert the investors' investments into
16 certificates of deposit or cashier's checks of Partner Bank, AD, which it claimed was a bank in
17 Montenegro with a branch office in Victoria, British Columbia, Canada. When investors were
18 unable to cash the checks purportedly drawn on Partner Bank, AD, they were told that the
19 problem would be solved soon. Although investors received communications through 2003
20 providing various explanations for delays in payment, no payment has been forthcoming nor has
21 any adequate explanation of what happened to the investors' money.
22
23
24
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1 XIII.

2 **OFFER AND SALE OF INDIRECT INVESTMENTS IN MILLENNIUM GROUP**
3 **INTERNATIONAL, INC. TO WASHINGTON RESIDENTS**

4 Offer and sale by Karen Thurston

5 In December 1998, Karen Thurston, solicited an acquaintance from her church to invest
6 in a pool with other investors to purchase a newly issued \$10,000 bond from Liechtenstein. The
7 bond would be purchased from a bond broker and would be held by a foreign corporation.
8 Investors in the pool were to get 100% interest a month. The interest was to be paid every 30
9 days to Thurston as the organizer of the pool. She would then pay shares of the interest to the
10 pool members. After 10 months, the bond principal would be returned to the investors. Based on
11 Thurston's representations, the acquaintance, a Vancouver, Washington resident, wired \$3,000 to
12 the account of Regency Asset Management Ltd at Royal Bank of Canada in Grand Cayman,
13 Cayman Islands. Of the amount wired, \$2,000 was the acquaintance's money. The remaining
14 \$1,000 was from Thurston.
15

16 Offers and sales by Mark Robison and The Havenhurst Group

17 A few months after making this investment, the Vancouver resident received some
18 documents in the mail from Mark Robison relating to the investment. Robison is married to
19 Karen Thurston's sister. These papers included an affidavit for the Vancouver resident to fill out
20 stating that the Vancouver resident had requested information on the investments and had not
21 been solicited to invest. The Vancouver resident signed the affidavit and returned it to Robison
22 by mail. The Vancouver resident appears to have been credited with accrued interest on the
23 original investment, as well as the principal amount of the original investment in the amount of
24 the new investment. Thereafter, Robison provided the Vancouver resident with account
25

1 statements showing distributions made on the investment. He paid the distributions with checks
2 drawn on his personal checking account. He initially delivered the checks to Karen Thurston to
3 deliver to the Vancouver resident. He later delivered the checks by mail directly to the
4 Vancouver resident. Robison retained the first distribution check to the Vancouver resident,
5 saying that the check would be invested in a second investment program for the Vancouver
6 resident. Robison told the Vancouver resident that no income tax needed to be paid on these
7 distributions as Robison had already paid the tax.
8

9 The Vancouver resident made another investment, this time of \$2,000, through Robison.
10 At his direction, the Vancouver resident wired the funds to the account of Roger and Bonnie
11 Conrad at Central Bank in Spanish Fork, Utah. Roger Conrad was an associate and later an
12 employee of Millennium Group International, Inc. The terms of the new investment were the
13 same as the terms of the Vancouver resident's initial investment made through Karen Thurston.
14 Several days after the Vancouver resident wired the funds to the Conrads' account, the
15 Vancouver resident received another affidavit of non-solicitation by mail from Robison to sign.
16

17 Several months later, Robison mailed the Washington resident a document entitled
18 Private-Party Loan Agreement. This agreement stated that the Vancouver resident had loaned
19 The Havenhurst Group \$4,400, an amount that represented the sum of the Vancouver resident's
20 two investments plus the reinvested distribution payment. The agreement was for 376 days. At
21 the end of that term, the Vancouver resident was supposed to receive the principal value plus
22 12% profit. Under the terms of the agreement, The Havenhurst Group was to transfer the funds
23 to an asset management group, which would invest the funds in high yield projects. The
24 agreement did not name the asset management group. The agreement stated that the Vancouver
25 resident had no management power over the business or assets of The Havenhurst Group. The

1 form of this agreement appears to be substantially identical to the form used by Millennium
2 Group International, Inc. in its Private Party Loan Agreements. Robison provided no information
3 to the Vancouver resident about how The Havenhurst Group was organized, who managed it, the
4 business experience of its managers, its financial condition, or the results of its operations. The
5 Vancouver resident signed the contract and mailed it back to Robison.
6

7 The Vancouver resident made several more investments through Robison. These
8 investments were made in April and May 2000 and totaled more than \$32,000. These
9 investments had the same terms as the prior The Havenhurst Group investment. The Vancouver
10 resident, at Robison's direction, wired the investment funds to The Havenhurst Group's account
11 at Montana First National Bank. Each investment was memorialized by an addendum to the
12 Vancouver resident's Private-Party Loan Agreement with The Havenhurst Group. The final
13 addendum showed a total investment balance of \$40,000 for the Vancouver resident.

14 The Vancouver resident's spouse also made two investments through Robison. These
15 investments totaled \$20,000. Some of the money was wired to The Havenhurst Group's bank
16 account in Kalispell, Montana. The terms were the similar those of the investments made by the
17 Vancouver resident. However, at least one of these investments was with Cambio Corporation,
18 rather than with The Havenhurst Group. Robison sent Private-Party Loan Agreement forms to
19 the Vancouver resident's spouse in connection with these investments. Robison asked that the
20 Private-Party Loan Agreement with Cambio Corporation be sent to him at his Kalispell address
21 rather than to the official Cambio Corporation address in Las Vegas.
22

23 Robison told the Vancouver resident that Robison had loaned out the funds loaned to The
24 Havenhurst Group to other entities. Beginning in October 2000, Robison repeatedly said that the
25 money had been loaned to Dennis Cope of Green Gables Group. Robison sometimes said that

1 the money was being held in a U.S. bank by the government. At other times, Robison said that
2 the money had been invested in Mexican oil companies. The Vancouver resident would not
3 knowingly have invested in a Mexican oil venture. Through 2003, Robison has told the
4 Vancouver resident various stories about what has happened to the money invested. Robison
5 also sent letters addressed to a group of investors concerning what has happened to the money.
6 In 2003, Robison admitted to the Vancouver resident that The Havenhurst Group was just a
7 shell.
8

9 XIV.

10 **DIRECT OFFERS AND SALES OF MILLENNIUM GROUP INTERNATIONAL, INC.
11 INVESTMENTS TO WASHINGTON RESIDENTS**

12 Offers and Sales by Aaron Mace of Millennium Group International, Inc. investments

13 Beginning in September 1999 or earlier, Aaron Mace solicited a number of residents of
14 Washington's Tri-Cities area to invest with Millennium Group International, Inc. The
15 investments Mace offered paid a return profit, usually of 10%-12%, but in at least one case, of
16 100%. The funds were to be invested through Millennium International Group, Inc., which
17 would pool the funds of investors and invest those funds in various projects in the United States
18 and abroad, including Mexico. The investments were evidenced by a contract called a Private
19 Party Loan Agreement. Those who invested in these Private Party Loan Agreements received
20 acknowledgment of receipt of their investments by mail from Dennis Cope as well as copies of
21 their Private Party Loan Agreements signed by Cope.

22 Offers and Sales by Dennis Cope of Millennium Group International, Inc. investments

23 Dennis Cope, himself, offered Millennium Group International, Inc. investments to
24 Washington residents. At least one Washington resident, a resident of Port Angeles, invested a
25

1 total of \$96,000 with Millennium Group International, Inc. from January 2000 through July
2 2000. Cope told the Port Angeles resident that his funds would be invested in collateral overseas
3 loans. The investments were supposed to return about 10% profit. When the Port Angeles
4 resident stopped receiving periodic interest payments he called Cope to ask what was happening
5 with his investments. In their telephone call, which was in October 2000, Cope told him that the
6 funds were being held at the Bank of Montenegro in time certificates of deposit earning 12%
7 annually. In another conversation, after the World Trade Center disaster in September 2001,
8 Cope told the Port Angeles investor that the transfer of funds had been delayed but offered no
9 further explanation of what was happening with the Port Angeles resident's investment.
10

11 Millennium Group International, Inc. membership interests sold to Washington investors

12 In addition to investments in Private Party Loan Agreements, Millennium Group
13 International, Inc. also offered memberships, which included participation in a profit-sharing
14 program. Dues for the memberships were \$100 a month, payable in increments of one year.
15 Members were also required to pay a maintenance fee of \$95 a year. Millennium Group
16 International, Inc. pooled the dues and invested them in various profit-making ventures. The
17 profits from these ventures were to be distributed to the group quarterly.
18

19 Millennium Group International, Inc. provided written materials describing the
20 membership offered. The written materials state that membership in Millennium Group
21 International, Inc. allows members to safely invest in opportunities that are extremely profitable
22 that would otherwise be unavailable to the members. The written materials refer to Millennium
23 Group International, Inc.'s proven track records, but provide no further information about what
24 the track record might be such as who was responsible for Millennium Group International,
25 Inc.'s investing activities; the background and qualifications of the principals of Millennium

1 Group International, Inc. and of those doing its investing; the length of time Millennium Group
2 International, Inc. had been investing; how much money Millennium Group International, Inc.
3 had invested for its members; the financial results of its investing activities; and the nature of the
4 investing activities. The written materials provide no financial statements or other information
5 about the financial condition of Millennium Group International, Inc.
6

7 Green Gables Group continued to accept checks for membership dues through at least
8 October 2000.

9 XV.

10 **PURPORTED RESCISSION BY MILLENNIUM GROUP INTERNATIONAL, INC. AND**
11 **OFFERS AND SALES BY FIIK INVESTMENT & HOLDINGS, INC. TO**
12 **WASHINGTON RESIDENTS**

13 Millennium Group International, Inc.'s offer to rescind Private Party Loan Agreements

14 On June 6, 2000, Millennium Group International, Inc. offered to rescind its Private Party
15 Loan Agreements with investors. Dennis Cope sent the offer to investors, including those
16 investors who were Washington residents. The offer to rescind stated that Millennium Group
17 International, Inc. had not complied with the securities laws in offering and selling its Private
18 Party Loan Agreements. This offer stated, among other things, that an investor who rescinds his
19 or her Private Party Loan Agreement would receive his or her principal amount plus 6% interest
20 less any distributions already made to the investor. The offer provided a very limited amount of
21 disclosure. Among the things it said were that Millennium Group International, Inc. had an
22 operating history of less than two years, that it has no audited financial statements, that it has no
23 significant business activities other than the Private Party Loan Agreements, that Millennium
24 Group International, Inc.'s investment with FIIK was not collateralized, and that if FIIK
25 defaulted investors would have to rely on Millennium Group International, Inc. to take legal

1 action to recover the investors' money as the investors had no privity of contract with FIIK. The
2 offer acknowledged that it did not include sufficient information for investors to decide whether
3 or not to accept the offer.

4 Offer by FIIK Investments & Holdings, Inc. to Millennium Group International, Inc. investors

5 Millennium Group International, Inc. sent investors a letter dated August 11, 2000 stating
6 that it was canceling all of its Private Party Loan Agreements on advice of legal counsel and
7 releasing the principal amount held. The letter did not explain how the funds would be released.
8 The letter said that the release of funds would release Millennium Group International, Inc. and
9 its agents from all claims under the investor's Private Party Loan Agreement. The letter
10 requested the investor sign the sign and return the letter to the Millennium Group International,
11 Inc. At least one Washington resident did so.

12
13 On August 10, 2000, FIIK Investment & Holdings, Inc. directed a written offer to
14 Millennium Group International, Inc. investors to enter into a direct contract with those
15 investors. The offer was based on the investor having cancelled his or her Private Party Loan
16 Agreement with Millennium Group International, Inc. To accept the offer, the investor had to
17 release Millennium Group International, Inc. from liability. The investor also had to agree that
18 all communications with FIIK Investment & Holdings, Inc. were to be directed through Green
19 Gables Group. The offer stated that FIIK Investment & Holdings, Inc. was the custodian of
20 investor funds held in Wells Fargo Bank in Houston, Texas.

21
22 The offer was accompanied by a document entitled Private Placement and Confidentiality
23 Agreement and a second document entitled Escrow Agreement. These documents stated that the
24 investor would deposit funds in a Wells Fargo Bank account to be used in an asset management
25 program by FIIK Investment & Holdings, Inc., which would pool the funds and invest them in

1 the restaurant business: acquiring and merging restaurant franchises into single holding company
2 for the purpose of establishing and remarketing a restaurant REIT. The documents state that FIIK
3 Investment & Holdings, Inc. guarantees that it will return the investor at a specified time if the
4 investor has not received the profits by that time.

5
6 The documents state that FIIK Investment & Holdings, Inc. has specialized expertise in
7 the restaurant acquisition and development business. However, the documents do not provide
8 any further information about what experience, if any, FIIK Investment & Holdings, Inc. and its
9 agents have in the restaurant business in particular or in assessment management in general. The
10 investors were not provided with any information on the financial condition of FIIK Investment
11 & Holdings, Inc.; on the identity of the persons to be managing the investors' assets and the
12 experience of those persons in asset management; or on the business history of FIIK Investment
13 & Holdings, Inc. The documents state that FIIK Investment & Holdings, Inc. would make all
14 distributions of asset management profits to investors through a New York attorney's escrow
15 account. The documents do not provide any further information about who the New York
16 attorney might be or the identity and nature of the escrow account. The documents were to be
17 signed by the investors, mailed to Millennium Group International, Inc. in Arizona, and then
18 countersigned by Edgar Bias as CEO and director of FIIK Investment & Holdings, Inc. At least
19 one Washington resident signed the documents and sent them to Millennium Group
20 International, Inc. Investors were not told that accepting the offer would mean that they would
21 receive worthless instruments from a bank not authorized to do business in the United States or
22 Canada in return for giving up their claims in connection with their earlier investments with
23 Millennium Group International, Inc.
24
25

1 XVI.

2 **SUBSTITUTION OF PARTNER BANK, AD INSTRUMENTS FOR INVESTMENTS**
3 **MADE BY WASHINGTON RESIDENTS**

4 Offer and Sale of Certificates of Deposit from Partner Bank, AD of Podgorica, Montenegro

5 On August 21, 2000, Green Gables Group, acting for FIIK Investment & Holdings, Inc.
6 sent a letter to investors asking the investors to specify the amount of their total investment they
7 wanted returned to them on September 18, 2000, the first distribution date. At least one
8 Washington resident requested the return of a portion of that investor's investment. Dennis Cope
9 responded to this request by saying that it had come too late and that Cope had already
10 authorized a certificate of deposit for the entire amount of the Washington resident's investment.
11 He directed the Washington resident to return the certificate of deposit upon receipt so that it
12 could be reissued in the correct amount. The Washington resident did so and in return received a
13 certificate of deposit for the revised amount and three cashier's checks. The certificate of deposit
14 was issued by and the cashier's checks drawn on Partner Bank, AD of Podgorica, Montenegro.
15 The Washington resident deposited the checks at the local bank. The bank informed the
16 Washington resident that the checks were worthless. Green Gables Management sent a letter in
17 mid-October 2000 acknowledging that investors had had problems negotiating the checks issued
18 by Partner Bank. The letter suggested that if investors would open accounts at the Palmdale,
19 California branch of Wells Fargo Bank, they would be able to negotiate the checks.
20

21 In mid-November 2000, investors received a letter purporting to be from Charles Covell,
22 executive vice president of the Canadian office of Partner Bank, AD, located at 895 Fort St Ste
23 302, Victoria, British Columbia, V8W1H7. This letter included instructions for submitting
24 Partner Bank, AD checks for payment, or for purchasing a certificate of deposit with the checks,
25

1 or depositing the funds in Partner Bank, AD savings account. The letter stated that the Partner
2 Bank, AD certificates of deposit pay 24% per annum interest while the Partner Bank, AD
3 savings accounts pay 10% per annum interest.

4
5 **XVII.**

6 **CONTINUING COMMUNICATIONS WITH WASHINGTON RESIDENTS**

7 Investors Are Requested to Sign Affidavits Stating that the Principal Had Been Returned

8 In late February 2001, investors received a letter from Dennis Cope for Green Gables
9 Management, together with a letter from Edgar Bias to Cope and a document called Affidavit of
10 Full Principal Return. The letters from Cope and Bias both said all investors had to fill out the
11 affidavit and return it before any of the investors would be allowed access to their accumulated
12 investment earnings. In his letter, Bias said that the affidavits were required by federal regulators
13 in order to close the transaction FIIK Investment & Holdings, Inc. was engaged in. At least one
14 Washington resident did complete and return the affidavit.

15 Continuing Communications to Investors

16 Dennis Cope and the Green Gables Group have continued to communicate by letter and
17 electronic mail with investors through at least February 2003. These communications have
18 offered various explanations for the delays the investors have experienced in getting back the
19 money they invested. The communications continue to provide hope to investors that the
20 problems will be solved and the investors will get their money back.

21
22 **XVIII.**

23 **REGISTRATION AND LICENSING STATUS IN WASHINGTON**

24 Neither The Havenhurst Group; nor Millennium Group International, Inc.; nor Green
25 Gables Group; nor FIIK Investment & Holdings, Inc.; nor Partner Bank, AD is currently

1 registered to sell its securities in the state of Washington and none has previously been so
2 registered.

3 XIX.

4 Neither Karen Thurston, nor Mark Robison, nor Aaron Mace, nor Dennis Cope, nor
5 Edgar Bias is currently registered as a securities salesperson or broker-dealer in the state of
6 Washington and none has previously been so registered.
7

8 XX.

9 Neither The Havenhurst Group; nor Millennium Group International, Inc.; nor Green
10 Gables Group; nor FIIK Investment & Holdings, Inc. is currently registered as a broker-dealer in
11 the state of Washington and none has previously been so registered.

12 XXI.

13 The Securities Administrator finds that the continued offering of investment contracts,
14 profit sharing arrangements, or evidences of indebtedness in the manner described in Tentative
15 Finding of Fact paragraphs XII through XVI, presents a threat to the investing public.

16 Based upon the Tentative Findings of Fact, the following Conclusions of Law are made:

17 CONCLUSIONS OF LAW

18 I.

19 The offer or sale of investment contracts, profit sharing arrangements, or evidences of
20 indebtedness described above constitutes the offer or sale of a security as defined in RCW
21 21.20.005(10) and (12).
22

23 II.

1 The offer or sale of said securities is in violation of RCW 21.20.140 because no
2 registration or notification of claim of exemption for such offer or sale is on file with the
3 Securities Administrator.

4 III.

5 Mark Robison; Havenhurst Group; Dennis Cope; Green Gables Group; Karen Thurston;
6 Cambio Corporation; Millennium Group International, Inc.; FIIK Investment & Holdings, Inc.;
7 Edgar Bias; Aaron Mace; and Charles Covell have each violated RCW 21.20.040 by offering or
8 selling said securities while not registered as a securities salesperson or broker-dealer in the state
9 of Washington.
10

11 IV.

12 The offer or sale of said securities was made in violation of RCW 21.20.010 because the
13 statements made in connection with the offer or sale were misleading because they omitted to
14 information necessary to make those statements not misleading, including but not limited to the
15 risks of investment, the absence of liquidity of the investments, the absence of any track record
16 by the principals in the investment activities they claimed to be engaged in, the financial
17 condition of issuers, and, in the case of Partner Bank, AD certificates of deposit, the fact that
18 Partner Bank, AD was not authorized to do business in the United States or in Canada where it
19 purported to have an office.
20

21 V.

22 The Securities Administrator finds that an emergency exists, that the continued violations
23 of RCW 21.20.010, RCW 21.20.040, and RCW 21.20.140, constitute a threat to the investing
24 public, and that summary orders to cease and desist from those violations are in the public
25 interest and necessary for the protection of the investing public.

1 **NOTICE OF INTENT TO IMPOSE FINES**

2 Based upon the offers and sales of unregistered securities to Washington residents, by
3 unregistered broker-dealers and/or salespersons, the misrepresentations and omissions
4 contained in those offers and sales, and upon the above Tentative Findings of Fact and
5 Conclusions of Law, the Securities Administrator finds that one or more knowing or reckless
6 violations of the Securities Act have occurred such that the imposition of fines is appropriate
7 pursuant to RCW 21.20.395. Therefore, the Securities Administrator intends to order that
8

- 9 a. Respondents Mark Robison, Cambio Corporation, and The Havenhurst
10 Group be jointly and severally liable for and pay a fine in an amount not to
11 exceed \$50,000.
- 12 b. Respondents Dennis Cope, Green Gables Group, and Millennium Group
13 International, Inc. be jointly and severally liable for and pay a fine in an
14 amount not to exceed \$100,000.
- 15 c. Respondents Edgar Bias and FIIK Investment & Holdings, Inc. be jointly
16 and severally liable for and pay a fine in an amount not to exceed \$100,000.
- 17 d. Respondents Charles Covell and Partner Bank, AD be jointly and severally
18 liable for and pay a fine in an amount not to exceed \$50,000.
- 19 e. Respondent Karen Thurston be liable for and pay a fine in an amount not to
20 exceed \$5,000.
- 21 f. Respondent Aaron Mace be liable for and pay a fine in an amount not to
22 exceed \$10,000.
23

24 **SUMMARY ORDER**

25 SUMMARY ORDER TO CEASE AND DESIST AND
NOTICE OF INTENT TO IMPOSE FINES

1

8

DEPARTMENT OF FINANCIAL INSTITUTIONS
Securities Division
PO Box 9033
Olympia, WA 98507-9033
360-902-8760

1 Based on the foregoing, NOW, THEREFORE, IT IS HEREBY SUMMARILY
2 ORDERED that Mark Robison; The Havenhurst Group; Dennis Cope; Green Gables Group;
3 Karen Thurston; Cambio Corporation; Millennium Group International, Inc.; FIIK Investment &
4 Holdings, Inc.; Partner Bank, AD; Edgar Bias; Aaron Mace; and Charles Covell; their agents and
5 employees each cease and desist from offering or selling securities in any manner in violation of
6 RCW 21.20.140, the section of the Securities Act of Washington requiring registration.
7

8 It is further SUMMARILY ORDERED that respondents, Mark Robison; The Havenhurst
9 Group; Dennis Cope; Green Gables Group; Karen Thurston; Cambio Corporation; Millennium
10 Group International, Inc.; FIIK Investment & Holdings, Inc.; Partner Bank, AD; Edgar Bias;
11 Aaron Mace; and Charles Covell; their agents, and employees each cease and desist from
12 violation of RCW 21.20.010, the anti-fraud section of the Securities Act.

13 It is further SUMMARILY ORDERED that Mark Robison; The Havenhurst Group;
14 Dennis Cope; Green Gables Group; Karen Thurston; Cambio Corporation; Millennium Group
15 International, Inc.; FIIK Investment & Holdings, Inc.; Edgar Bias; Aaron Mace; and Charles
16 Covell each cease and desist from violation of RCW 21.20.040, the section of the Securities Act
17 that requires registration of securities salespersons and broker-dealers.
18

19 **AUTHORITY AND PROCEDURE**

20 This Order is entered pursuant to the provisions of RCW 21.20.390 and is subject to the
21 provisions of RCW 34.05. The respondents, Mark Robison; The Havenhurst Group; Dennis
22 Cope; Green Gables Group; Karen Thurston; Cambio Corporation; Millennium Group
23 International, Inc.; FIIK Investment & Holdings, Inc.; Partner Bank, AD; Edgar Bias; Aaron
24 Mace; and Charles Covell may each make a written request for a hearing as set forth in the
25

1 NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING

2 accompanying this order.

3 If a respondent does not request a hearing, the Securities Administrator intends to adopt
4 the above Tentative Findings of Fact and Conclusions of Law as final and make the summary
5 order to cease and desist permanent as to that respondent and impose the fines described above
6 against that respondent.
7

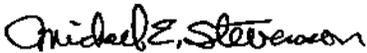
8 WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.

9 Dated this 20th day of February, 2004

11 

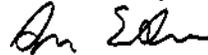
12 Deborah R. Bortner
13 Securities Administrator

14 Approved by:

15 

16 Michael E. Stevenson
17 Chief of Enforcement

18 Presented by:

19 

20 Suzanne Sarason
21 Financial Legal Examiner